

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

THE HOMESOURCE, CORP.,	Civil Action No.: 1:18-cv-11970
Plaintiff,	Hon. Eduardo C. Robreno (EDPA)
v.	Hon. Karen M. Williams
RETAILER WEB SERVICES, LLC, et al.,	Motion Day: March 16, 2020
Defendants.	

**DEFENDANT RETAILER WEB SERVICES, LLC'S NOTICE OF MOTION FOR
CONTEMPT AND SANCTIONS AGAINST PLAINTIFF**

PLEASE TAKE NOTICE that on March 16, 2020, or at an earlier date and time to be determined by the Court, undersigned counsel for Defendant Retailer Web Services, LLC, shall move before the Honorable Karen M. Williams, or any judge sitting in her stead in courtroom 5C of the U.S. District Court for the District of New Jersey, 4th & Cooper Streets, Camden, New Jersey, for an Order holding Plaintiff The HomeSource, Corp. in contempt and granting sanctions for violating this Court's October 16, 2019 Order [Dkt. 129] and failing to comply with its discovery obligations under Fed. R. Civ. P. 26 and 34, and

PLEASE TAKE FURTHER NOTICE that in support of this application, undersigned counsel will reply on the attached

Memorandum in Support, together with any exhibits attached thereto; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is simultaneously being filed herewith; and

PLEASE TAKE FURTHER NOTICE that a copy of this notice and motion were served via ECF on this date on all counsel of record.

Dated: February 10, 2020

Respectfully submitted,

/s/ Matthew A. Lipman

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